

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST INDIES  
PETROLEUM, LTD

Defendant.

CIVIL NO. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**OBJECTION TO JULY 14, 2025 SUBPOENA DUCES TECUM**

**NOW COMES** non-party Total Safety Virgin Islands, LLC (“Total Safety”) through undersigned counsel DUDLEY NEWMAN FEUERZEIG LLP, Charles E. Lockwood, Esq., and Gregg R. Kronenberger, Esq., and pursuant to FED. R. CIV. P. 45(d)(2)(B) objects to the July 14, 2025 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (the “Subpoena”) identified as Exhibit A to the July 14, 2025 Notice of Intent to Serve Subpoena [ECF 170]. As of the submission of this objection Total Safety has not yet been served with the Subpoena. Total Safety objects to the Subpoena on the grounds that it is untimely because the discovery deadline in this case has passed, the Subpoena fails to allow a reasonable time to comply, and the Subpoena is overly broad and unduly burdensome.

Respectfully Submitted,

DUDLEY NEWMAN FEUERZEIG LLP

**EXHIBIT**

**4**

Dated: July 25, 2025

By: /s/: Charles E. Lockwood  
Charles E. Lockwood, Esq..  
VI Bar No. 1112  
Gregg R. Kronenberger, Esq.  
VI Bar No. 1230  
*Attorneys For Total Safety*  
1131 King Street, Suite 204  
Christiansted, VI 00820-4971  
Email: [clockwood@dnfvi.com](mailto:clockwood@dnfvi.com)

**CERTIFICATE OF SERVICE**

**I HEREBY** certify that on this 25<sup>th</sup> day of July 2025, a true and correct copy of the foregoing ***OBJECTION TO JULY 14, 2025 SUBPOENA*** delivered via e-mail to:

Lee J. Rohn, Esq.  
Robin P. Seila, Esq.  
Lee J. Rohn and Associates LLC  
1108 King Street, Third Floor  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
[lee@rohnlaw.com](mailto:lee@rohnlaw.com)  
[robin@rohnlaw.com](mailto:robin@rohnlaw.com)  
[info@rohnlaw.com](mailto:info@rohnlaw.com)

/s/Gregg R. Kronenberger, Esq.